

1 JOHN W. CARPENTER (221708)  
2 Law Offices of John W. Carpenter LLC  
3 829 Baronne Street  
4 New Orleans, LA 70113  
5 Telephone: (504) 581-9311  
6 Cell Phone: (415) 577-0698  
7 Fax: (866) 410-6248  
8 Email: john@jwcarpenterlaw.com

9 *Attorneys for Plaintiff Albert John Freeman*

10 David H.S. Commins (CSBN 124205)  
11 Kit L. Knudsen (CSBN 154714)  
12 COMMINS & KNUDSEN, P.C.  
13 400 Montgomery Street, Suite 200  
14 San Francisco, CA 94104  
15 Telephone (415) 391-6490  
16 Fax (415) 391-6493  
17 david@commins.com  
18 kit@commins.com

19 *Attorneys for Defendant Delta Air Lines, Inc.*

20 *Full counsel blocks on signature page*

21 **UNITED STATES DISTRICT COURT**  
22 **NORTHERN DISTRICT OF CALIFORNIA**  
23 **OAKLAND DIVISION**

24 **Albert John Freeman**

25 Plaintiff and Counterclaim  
26 Defendant

27 v.

28 **Delta Air Lines, Inc.**

Defendant and  
Counterclaimant

Case No. C 13-04179 (JSW)

**STIPULATION TO REQUEST  
TELEPHONIC CASE  
MANAGEMENT CONFERENCE AND  
[PROPOSED] ORDER**

Judge: Honorable Jeffrey S. White

1       The undersigned represents the plaintiff Albert John Freeman. The parties herein jointly  
2 request that the Case Management Conference, scheduled for next Friday, April 18, 2014, be  
3 conducted telephonically.

4  
5       Contemporaneous with this letter, the parties are filing the Joint Case Management  
6 Statement. The parties have agreed on all issues in the Case Management Statement and there  
7 are no disputes that need to be addressed by the Court. As both trial counsel would have to  
8 travel on the holiday weekend to the Case Management Conference, we would respectfully  
9 request that the Court conduct the conference telephonically.

10  
11 The parties thank the Court in advance for its courtesies.

1  
2 DATED: April 10, 2014

Respectfully submitted,

3  
4 /s/ John W. Carpenter

JOHN W. CARPENTER (Cal. Bar No. 221708)  
829 Baronne Street  
New Orleans, LA 70113  
Telephone: (504) 581-9311  
Cell Phone: (415) 577-0698  
Fax: (866) 410-6248  
Email: john@jwcarpenterlaw.com

8  
9 *Attorney for Plaintiff*  
10 *Albert John Freeman*

11  
12 /s/ David H.S. Commins

13 David H.S. Commins (CSBN 124205)  
14 Kit L. Knudsen (CSBN 154714)  
15 COMMINS & KNUDSEN, P.C.  
16 400 Montgomery Street, Suite 200  
17 San Francisco, CA 94104  
18 Telephone (415) 391-6490  
19 Fax (415) 391-6493  
20 david@commins.com  
21 kit@commins.com

22 Stephen F. Roth (admitted *pro hac vice*)  
23 Alexander Solo (admitted *pro hac vice*)  
24 LERNER, DAVID, LITTENBERG,  
25 KRUMHOLZ & MENTLIK, LLP  
26 600 South Avenue West  
27 Westfield, NJ 07090-1497  
28 Tel: 908.518.6362  
Cell: 973-356-5159  
Fax: 908.654.7866  
SRoth@ldlkm.com  
ASolo@ldlkm.com

*Attorneys for Defendant Delta Air Lines, Inc.*

**[PROPOSED ORDER]**

Pursuant to stipulation and upon good cause shown, the Case Management Conference ("CMC") scheduled on April 18, 2014 at 11:00 AM shall be conducted telephonically. The Court personnel will initiate the conference call by dialing counsel's respective telephone numbers. For the telephone conference, Plaintiff will be represented by John W. Carpenter, whose telephone number for the purpose of the CMC is (941) 828-1432 ~~or his mobile phone number (415) 577-0698~~. Defendant's counsel is represented by Stephen F. Roth, who shall be available at telephone number (908) 518-6362. ~~[Alternatively, Counsels are directed to dial the Court's conference call telephone (415) \_\_\_\_\_].~~  
All numbers for counsel must be direct landline numbers.

IT IS SO ORDERED

Dated: April 14, 2014

  
United States District Judge